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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK ROWELL,

Plaintiff,

vs.

AVIZA TECHNOLOGY HEALTH AND
WELFARE PLAN and HARTFORD LIFE
AND ACCIDENT INSURANCE
COMPANY,

Defendants.

Case No.: C 10-5656 PSG

**DECLARATION OF STEVEN CHABRE IN
SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL DISCOVERY**

Hearing Date: September 27, 2011

Hearing Time: 10:00 AM

Hearing Place: San Jose

Hon. Paul S. Grewal, Magistrate Judge

I, Steven M. Chabre, declare as follows:

1. I am the attorney of record in this matter for plaintiff. By reason of my representation of plaintiff, I am familiar with the following facts:

2. On August 1, 2011 I met and conferred with Michael Bernacchi, defendants' attorney, regarding the discovery disputes that are the subject of plaintiff's motion to compel. The attached exhibit marked Exhibit A is a true and exact copy of the e-mails that document our discussions regarding the discovery dispute to date.

